## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

BRAULIO THORNE, ON BEHALF OF HIMSELF AND ALL OTHER PERSONS SIMILARLY SITUATED,

Plaintiffs,

Case No. 1:21-cv-03560-AJN

v.

TIEDEMANN WEALTH MANAGEMENT,

LLC,

Hon. Alison J. Nathan

Defendant.

## DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER, PLEAD, OR OTHERWISE RESPOND TO COMPLAINT

Defendant Tiedemann Wealth Management, LLC ("Defendant"), by and through its counsel, hereby files this Unopposed Motion for Extension of Time to Answer, Plead, or Otherwise Respond to Plaintiff's Complaint, and in support thereof states as follows:

- 1. Plaintiff commenced this action by filing the Complaint on April 21, 2021.
- 2. The Summons and Complaint in the above-captioned action were, upon information and belief, served on Defendant on May 4, 2021.
  - 3. Defendant's response to the Complaint is currently due on May 25, 2021.
- 4. Defendant respectfully requests a 45-day extension of time to respond to Plaintiff's Complaint. Plaintiff's counsel consents to this extension of time.
- 5. This request is being made in good faith and is not brought to delay litigation or prejudice any Party.

WHEREFORE, Defendant respectfully requests a 45-day extension to July 9, 2021, to answer, plead, or otherwise respond to Plaintiff's Complaint.

A proposed order is attached.

Dated: May 21, 2021 Respectfully submitted,

By: /s/Ryan P. Poscablo
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Counsel for Tiedemann Wealth Management, LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 21st day of May 2021, a true and correct copy of the foregoing document was served via the United States District Court's CM/ECF system, which sent notification of such filing to the following:

Jeffrey Gottlieb Michael LaBollita GOTTLIEB & ASSOCIATES 150 E. 18<sup>th</sup> Street Suite PHR New York, New York 10003 nyjg@aol.com michael@gottlieb.legal

/s/ Ryan P. Poscablo
Ryan P. Poscablo